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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

DEC 12 2023

SEAN F. MCAVOY, CLERK
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YAKIMA, WASHINGTON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

KIONGOZI RANN JONES, JR. and
BETHANY LISSETTE MORENO,

Defendants.

1:23-CR-2066-SAB
INDICTMENT

Vio.: 18 U.S.C. §§ 472, 2
Passing of Counterfeit
Currency
(Counts 1-9)

18 U.S.C. § 492, 18 U.S.C. §
982(a)(2)(B), 28 U.S.C. § 2461
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

On or about July 29, 2022, in the Eastern District of Washington, the
Defendants, KIONGOZI RANN JONES, JR. and BETHANY LISSETTE
MORENO, with the intent to defraud, passed twenty-four (24) falsely made, forged,
and counterfeit \$20 Federal Reserve Notes: one bearing serial number
EH18281332C, two bearing serial number JF92381332C, two bearing serial

1 number EE20381332C, six bearing serial number EF28381332C, and thirteen
2 bearing serial number HE31389288C, which the Defendants, KIONGOZI RANN
3 JONES, JR. and BETHANY LISSETTE MORENO, knew to be falsely made,
4 forged, and counterfeit, to the 7-11, located at 120 N. 1st Street, Selah, WA, 98942,
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6 in violation of 18 U.S.C. §§ 472, 2.
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8 COUNT 2

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10 On or about July 29, 2022, in the Eastern District of Washington, the
11 Defendants, KIONGOZI RANN JONES, JR. and BETHANY LISSETTE
12 MORENO, with the intent to defraud, passed six (6) falsely made, forged, and
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14 counterfeit \$20 Federal Reserve Notes: one bearing serial number EF28381332C
15 and five bearing serial number HE31389288C, which the Defendants, KIONGOZI
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17 RANN JONES, JR. and BETHANY LISSETTE MORENO, knew to be falsely
18 made, forged, and counterfeit, to the Topp Mart, located at 907 West 1st Ave.,
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20 Toppenish, WA, 98948, in violation of 18 U.S.C. §§ 472, 2.

21 COUNT 3

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23 On or about July 29, 2022, in the Eastern District of Washington, the
24 Defendant, KIONGOZI RANN JONES, JR., with the intent to defraud, passed
25 twenty-three (23) falsely made, forged, and counterfeit \$20 Federal Reserve Notes:
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27 one bearing serial number JL55349288C, three bearing serial number
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HE31389288C, five bearing serial number EE20381332C, three bearing serial

1 number EH18281332C, and eleven bearing serial number EF28381332C, which the
2 Defendant, KIONGOZI RANN JONES, JR., knew to be falsely made, forged, and
3 counterfeit, to the 7-11, located at 87 9th Street NE, East Wenatchee, WA, 98802,
4 in violation of 18 U.S.C. §§ 472, 2.
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7 COUNT 4

8 On or about July 29, 2022, in the Eastern District of Washington, the
9 Defendants, KIONGOZI RANN JONES, JR. and BETHANY LISSETTE
10 MORENO, with the intent to defraud, passed two (2) falsely made, forged, and
11 counterfeit \$20 Federal Reserve Notes: one bearing serial number HE31389288C
12 and one bearing serial number EF28381332C, which the Defendants, KIONGOZI
13 RANN JONES, JR. and BETHANY LISSETTE MORENO, knew to be falsely
14 made, forged, and counterfeit, to the Grant Road Food and Fuel, located at 96 Grant
15 Rd., East Wenatchee, WA, 98802, in violation of 18 U.S.C. §§ 472, 2.
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19 COUNT 5

20 On or about July 29, 2022, in the Eastern District of Washington, the
21 Defendant, BETHANY LISSETTE MORENO, with the intent to defraud, passed
22 one (1) falsely made, forged, and counterfeit \$20 Federal Reserve Note bearing
23 serial number EF28381332C, which the Defendant, BETHANY LISSETTE
24 MORENO, knew to be falsely made, forged, and counterfeit, to the Walgreens,
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1 located at 470 Grant Rd., East Wenatchee, WA, 98802, in violation of 18 U.S.C.
2 §§ 472, 2.
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4 COUNT 6

5 On or about July 29, 2022, in the Eastern District of Washington, the
6 Defendants, KIONGOZI RANN JONES, JR. and BETHANY LISSETTE
7 MORENO, with the intent to defraud, passed twenty-five (25) falsely made, forged,
8 and counterfeit \$20 Federal Reserve Notes: six bearing serial number
9 EF28381332C, ten bearing serial number HE31389288C, three bearing serial
10 number EE20381332C, two bearing serial number JL55349288C, two bearing serial
11 number JF92381332C, and two bearing serial number EH18281332C, which the
12 Defendants, KIONGOZI RANN JONES, JR. and BETHANY LISSETTE
13 MORENO, knew to be falsely made, forged, and counterfeit, to the Circle K,
14 located at 204 S. Main St., Ellensburg, WA, 98926, in violation of 18 U.S.C.
15 §§ 472, 2.
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21 COUNT 7

22 On or about July 29, 2022, in the Eastern District of Washington, the
23 Defendants, KIONGOZI RANN JONES, JR. and BETHANY LISSETTE
24 MORENO, with the intent to defraud, passed one (1) falsely made, forged, and
25 counterfeit \$20 Federal Reserve Note bearing serial number EE20381332C which
26 the Defendants, KIONGOZI RANN JONES, JR. and BETHANY LISSETTE
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1 MORENO, knew to be falsely made, forged, and counterfeit, to the 7-11, located at
2 1001 E. University Way, Ellensburg, WA, 98926, in violation of 18 U.S.C. §§ 472,
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4 2.

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COUNT 8

On or about July 29, 2022, in the Eastern District of Washington, the
Defendants, KIONGOZI RANN JONES, JR. and BETHANY LISSETTE
MORENO, with the intent to defraud, passed twenty-four (24) falsely made, forged,
and counterfeit \$20 Federal Reserve Notes: two bearing serial number
JF92381332C, two bearing serial number EH18281332C, four bearing serial
number EE20381332C, five bearing serial number JL55349288C, five bearing
serial number HE31389288C, and six bearing serial number EF28381332C which
the Defendants, KIONGOZI RANN JONES, JR. and BETHANY LISSETTE
MORENO, knew to be falsely made, forged, and counterfeit, to the 7-11, located at
1504 W Sylvester Street, Pasco, WA, 99301, in violation of 18 U.S.C. §§ 472, 2.

COUNT 9

On or about July 31, 2022, in the Eastern District of Washington, the
Defendants, KIONGOZI RANN JONES, JR. and BETHANY LISSETTE
MORENO, with the intent to defraud, passed ⁽¹⁷⁾forty-eight (48) falsely made, forged,
and counterfeit \$20 Federal Reserve Notes: one bearing serial number
EE20381332C, three bearing serial number JF92381332C, three bearing serial

1 number JL55349288C, five bearing serial number EF28381332C, seven bearing
2 serial number EH18281332C, and twenty-nine bearing serial number bearing
3 HE31389288C which the Defendants, KIONGOZI RANN JONES, JR. and
4 BETHANY LISSETTE MORENO, knew to be falsely made, forged, and
5 counterfeit, to the Walgreens, located at 425 Bridge St., Clarkston, WA, 99403, in
6 violation of 18 U.S.C. §§ 472, 2.
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10 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

11 The allegations contained in this Indictment are hereby re-alleged and
12 incorporated by reference for the purpose of alleging forfeitures.
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14 Pursuant to 18 U.S.C. § 982(a)(2)(B), upon conviction of an offense in
15 violation of 18 U.S.C. §§ 472, 2, as set forth in this Indictment, the Defendants
16 KIONGOZI RANN JONES, JR. and BETHANY LISSETTE MORENO, shall
17 forfeit to the United States of America any property constituting, or derived from,
18 any proceeds obtained, directly or indirectly, as the result of such violation.
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21 Pursuant to 18 U.S.C. § 492 and 28 U.S.C. § 2461(c), upon conviction of an
22 offense in violation of 18 U.S.C. §§ 472, 2, as set forth in this Indictment, the
23 Defendants, KIONGOZI RANN JONES, JR. and BETHANY LISSETTE
24 MORENO shall forfeit to the United States of America, all counterfeits of any coins
25 or obligations or other securities of the United States or of any foreign government;
26 any articles, devices, and other things made, possessed, or used in violation of 18
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1 U.S.C. § 472; and, any material or apparatus used or fitted, or intended to be used,
2 in the making of such counterfeits, articles, devices, or things, found in the
3 possession of the Defendant without proper authority.
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5 If any forfeitable property, as a result of any act or omission of the
6 Defendants:

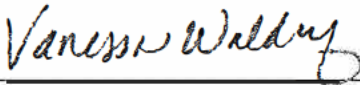
- 7 a. cannot be located upon the exercise of due diligence;
8 b. has been transferred or sold to, or deposited with, a third party;
9 c. has been placed beyond the jurisdiction of the court;
10 d. has been substantially diminished in value; or
11 e. has been commingled with other property, which cannot be divided
12 without difficulty,

13 the United States of America shall be entitled to forfeiture of substitute property
14 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) or 28
15 U.S.C. § 2461(c).
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17 DATED this 12th day of December, 2023.
18

19 A TRUE BILL
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21 
22 Foreperson

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24 Vanessa R. Waldref
25 United States Attorney

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27 Christopher J. Bridger
28 Assistant United States Attorney